

**Frank Baxter**

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**From:** Kopp, Ron <rkopp@ralaw.com>  
**Sent:** Friday, May 8, 2020 10:37 AM  
**To:** David Harvey  
**Subject:** RE: Follow-up


David, per my email below, I would appreciate your confirming that my email of last week was sent only to your client's personal email address, and not to his work address. Thank you.

**From:** Kopp, Ron <rkopp@ralaw.com>  
**Sent:** Wednesday, April 29, 2020 1:39 PM  
**To:** David Harvey <dvdharv@harvlaw.com>  
**Subject:** Follow-up

David, I would appreciate your confirming to me that you are not sending any of the information I forwarded you this morning to your client's work email account. His employer is a competitor, and once the information is on its system, it is there for anyone to find. Given that Ronnie is an owner of American Security with fiduciary duties to it, I'm sure he would not share information about my client intentionally. However, we need to make sure information does not come into his current employer's possession under any circumstances. Please assure me you are communicating with your client only at his personal email address. It goes without saying that he has a fiduciary and contractual duty to refrain from informing his employer of American Security's troubled financial condition, even if only by implication.

More, given that we may well be heading towards litigation, I would ask that you confirm that you have instructed your client to preserve all information in his possession having to do with American Security or having to do with our claim that he has breached his noncompetition and confidentiality agreement with American Security. We expect that discovery will entail understanding all activities in which he has engaged while in his current employment, so all contacts he has had with his current employer and with customers should be preserved. I represent to you that I have instructed my client to preserve all relevant or potentially relevant information.

I will await your assurance that you are communicating with your client about American Security only at his personal email address. Thank you. Ron

Ronald S. Kopp  
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*Both Ronald S. Kopp and Roetzel & Andress intend that this message be used exclusively by the addressee(s). This message may contain information that is privileged, confidential and exempt from disclosure under applicable law. Unauthorized disclosure or use of this information is strictly prohibited. If you have received this communication in error, please permanently dispose of the original message and notify Ronald S. Kopp immediately at 330.849.6644.. Thank you.*

